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8 Attorneys for Plaintiff,
9 NAKED WHEY, INC.

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NAKED WHEY, INC., a Florida
corporation;

Plaintiff,

vs.

D&L INVESTMENT LTD., d/b/a DELEY
NATURALS, a Nevada corporation; and
DOES 1 – 25,

Defendant.

Case No.: 2:18-cv-1616

**COMPLAINT FOR DAMAGES,
RESTITUTION, AND INJUNCTIVE
RELIEF:**

- 1. TRADEMARK
INFRINGEMENT;**
- 2. TRADEMARK DILUTION;**
- 3. TRADE DRESS
INFRINGEMENT;**
- 4. COMMON LAW
TRADEMARK AND TRADE
DRESS INFRINGEMENT;**
- 5. INJURY TO BUSINESS
REPUTATION;**
- 6. UNFAIR COMPETITION;**
- 7. ANTI-CYBERSQUATTING
CONSUMER PROTECTION
ACT.**

DEMAND FOR JURY TRIAL.

Plaintiff Naked Whey, Inc. (“Plaintiff” or “Naked”), a Florida corporation,
brings this action against D&L Investments Ltd., d/b/a Deley Naturals (“Defendant”
or “Deley”), a Nevada corporation, and DOES 1 - 25 for injunctive relief, restitution,
and damages, and alleges as follow:

I. JURISDICTION AND VENUE

1
2 1. This Court has original jurisdiction over this matter to adjudicate the
3 Lanham Act claims pursuant to 15 U.S.C. § 1121, subject matter jurisdiction pursuant
4 to 28 U.S.C. §1331 and 28 U.S.C. § 1338(a) and (b), and supplemental jurisdiction of
5 the state law claims pursuant to 28 U.S.C. § 1367(a).

6 2. This Court has personal jurisdiction over Defendant. Upon information
7 and believe, Defendant maintains its principal place of business in Clark County,
8 Nevada. Further, this Court has personal jurisdiction over each of the Defendants.
9 The Defendants solicit, transact, and are doing business within the State of Nevada;
10 have committed unlawful and tortious acts both within and outside the State of
11 Nevada causing injury in Nevada and within this judicial district; and are regularly
12 doing or soliciting business or engaging in a persistent course of conduct in the State
13 of Nevada.

14 3. Venue is proper under 38 U.S.C §1391(b)-(d). A substantial part of the
15 events giving rise to this action occurred in this judicial district. 28 U.S.C. § 1391(b).
16 Plaintiff is informed and believe, and on that basis alleges, that Defendant has and/or
17 is currently selling its goods throughout this District either by way of retail stores or
18 online stores that sell to consumers in this District.

II. THE PARTIES

19
20 4. Plaintiff is a Florida corporation with its principal place of business
21 located at 4061 Palau Dr., Sarasota, FL 34241. Plaintiff is engaged in the business of,
22 *inter alia*, selling nutritional and dietary supplements and providing information
23 relating to nutrition, diet, health and wellness.

24 5. Plaintiff is informed and believes, and on that basis alleges, that
25 Defendant is a Nevada Corporation with its principal place of business located at 530
26 S. 8th Street, Las Vegas, NV 89101. Plaintiff is further informed and believes, and
27 on that basis alleges, that Defendant owns and/or has operated the website
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1 www.intentionallynaked.com for the purposed of advertising and promoting the sale
2 and distribution of supplements branded “Intentionally NAKED.”

3 6. Plaintiff is ignorant of the true names and capacities of defendants sued
4 herein as DOES 1 – 25, inclusive, and therefore sues these defendants by such
5 fictitious names. Plaintiff will seek leave of Court to amend the Complaint to add
6 such persons and entities as defendants, and to allege the exact nature of their
7 wrongful conduct when such information has been ascertained. Plaintiff is informed
8 and believes, and thereon alleges, that each of the fictitiously named defendants is
9 responsible in some manner for the occurrences herein alleged, and that Plaintiff’s
10 injuries herein alleged were proximately caused by their conduct.

11 7. Plaintiff is informed and believes, and thereon alleges, that at all times
12 herein mentioned, each of the Defendants was the agent and employee of each of the
13 other Defendants, and in doing the things hereinafter alleged, each Defendant was
14 acting within the course and scope of such agency and/or employment.

15 8. Hereafter, Defendant Deley and DOES 1 – 25, when not referred to
16 specifically and individually, shall be referred to collectively as “Defendants.”

17 **III. NATURE OF ACTION**

18 9. This is an action for trademark infringement (15 U.S.C. § 1114(a) and
19 common law), trade dress infringement (15 U.S.C. § 1125(a) and common law),
20 trademark dilution, injury to business reputation, unfair business practices, and
21 violations of the Anti-Cybersquatting Consumer Protection Act.

22 **IV. GENERAL ALLEGATIONS**

23 **A. Plaintiff’s Trademarks**

24 10. Naked Whey, Inc. was founded in 2014, at which time Plaintiff began
25 using the “Naked” mark in interstate commerce in connection with its nutritional and
26 dietary supplements company and to provide information online relating to nutrition,
27 diet, health and wellness.

1 11. Plaintiff produces a variety of distinct and high quality supplements
2 under its brand, and offers and sells its products throughout the United States and
3 internationally.

4 12. Plaintiff offers and sells its more than 30 different nutritional and
5 supplement products to the public through various channels, including, but not
6 limited to, its website and various e-commerce platforms such as Amazon, The
7 Vitamin Shoppe, and eBay.

8 13. Plaintiff is the owner of thirteen valid, subsisting, uncanceled
9 trademarks. Naked owns a number of trademarks, which include:

- 10 i. Naked Nutrition – U.S. Trademark Registration number 5304095
- 11 ii. Naked Pea – U.S. Trademark Registration number 5020266
- 12 iii. Naked Whey – U.S. Trademark Registration number 5304094
- 13 iv. Naked Casein – U.S. Trademark Registration number 5304096
- 14 v. Naked Egg – U.S. Trademark Registration number 5204303
- 15 vi. Naked Goat – U.S. Trademark Registration number 5204308
- 16 vii. Naked Rice – U.S. Trademark Registration number 5204309
- 17 viii. Less Naked – U.S. Trademark Registration number 5304095
- 18 ix. Naked PB – U.S. Trademark Registration number 5369917
- 19 x. Naked Glutamine – U.S. Trademark Registration number 5378686
- 20 xi. Naked Creatine – U.S. Trademark Registration number 5384586
- 21 xii. Naked Mass – U.S. Trademark Registration number 5500843
- 22 xiii. Naked Energy – U.S. Trademark Registration number 5533423

23 A copy of said trademark registrations are attached hereto as Exhibit A. These
24 trademarks marks along with common law rights to the trademark “Naked” are
25 hereinafter collectively referred to as the “Naked Marks.”

26 ///

27 ///

1 14. These registrations are conclusive evidence of Plaintiff's exclusive right
2 to use NAKED in commerce or in connection with the goods specified in the
3 registration.

4 15. Plaintiff has also filed the following U.S. Trademark Applications,
5 which are pending before the United States Patent and Trademark Office:

- 6 i. Naked – Application number 87679223
- 7 ii. Get Naked – Application number 87946509
- 8 iii. Naked BCAAs – Application number 87802003
- 9 iv. Naked Meal – Application number 87802008

10 16. Since at least 2014, Plaintiff has adopted and continuously used the
11 Naked Marks and its trade name, Naked, in connection with International Class 005
12 for protein supplements and nutritional supplements. Naked is a prominent, national
13 brand; with products available nationwide in all major markets in the United States
14 and internationally in the European Union, Canada, and India.

15 17. Plaintiff has invested substantial amounts of time, effort, and money in
16 developing, marketing, promoting and protecting the Naked Marks throughout the
17 United States. Plaintiff's Naked Marks are strong in light of the successful use,
18 significant sales volume, and widespread recognition. In addition to the protection
19 afforded by Plaintiff by its thirteen trademark registrations, Plaintiff has extensive,
20 non-registered statutory and common law rights in the Naked Marks.

21 **B. Plaintiff's Trade Dress**

22 18. Since 2014, Plaintiff has consistently utilized a very specific design,
23 which includes "Naked" and the specific product name in block letters on a
24 minimalistic background. See examples of trade dress below ("Plaintiff's Trade
25 Dress"):

26 ///

27 ///



19. Since at least September of 2014, Plaintiff has marketed and sold nutritional and dietary supplements in the United States featuring this distinctive Trade Dress.

20. Plaintiff's Trade Dress is inherently distinctive and has become associated with Plaintiff. Products sold under Plaintiff's Trade Dress have achieved commercial success. A sample of media coverage and reviews of Naked products are attached hereto as Exhibit B, and incorporated herein by reference.

C. Defendant's Trademark

21. Plaintiff is informed and believes, and on that basis alleges, that Defendant applied to register the mark "Intentionally Naked" on September 20, 2017

1 for “Vitamins; Dietary supplements; Nutritional supplements” in International Class
2 005 in U.S. Trademark Application Serial No. 87/615,283. Defendant filed an intent-
3 to-use trademark application, although, Plaintiff is informed and believe the goods
4 have been sold nationwide since on or about April 6, 2018.

5 22. On April 10, 2018, Plaintiff filed its opposition against U.S. Trademark
6 Application Serial No. 87/615,283 with the Trademark Trial and Appeal Board.
7 Defendant answered on May 21, 2018.

8 23. Plaintiff is informed and believes, and on that basis alleges, that
9 Defendant markets, promotes, and/or sells nutritional and dietary supplements using
10 Intentionally Naked. Plaintiff is further informed and believes, and on that basis
11 alleges, that Defendant’s Intentionally Naked products include protein products and
12 other supplements.

13 24. Plaintiff is informed and believes, and on that basis alleges, that
14 Defendant markets, promotes, and/or sells Intentionally Naked marked supplements
15 in intrastate and interstate channels of commerce in the United States that overlap
16 with those where Plaintiff’s similar category of products are available for sale.

17 25. Plaintiff is informed and believes, and on that basis alleges, that
18 Defendant began to use the Intentionally Naked mark to market, promote, and/or sell
19 its supplements in intrastate and interstate commerce in the United States after the
20 time at which Plaintiff had already long established priority of use in the Naked
21 Marks for nutritional and dietary supplements.

22 26. Plaintiff is further informed and believes, and on that basis alleges, that
23 Defendant owns and/or has operated the website www.intentionallynaked.com for the
24 purposed of advertising and promoting the sale and distribution of supplements
25 branded “Intentionally Naked” and that Defendant intends to use this website to
26 promote Defendant’s products.

27. Plaintiff is informed and believes, and on that basis alleges, that Defendant registered the domain names on September 14, 2017, which is subsequent to the date Plaintiff began use of the Naked Marks.

28. Defendant's use of the Intentionally Naked mark is and continues to be without permission or authorization of Plaintiff. The goodwill of Plaintiff's business under the Naked Marks is of enormous value, and Plaintiff will suffer irreparable harm should Defendant's infringement be allowed to continue to the great detriment of Plaintiff's reputation and goodwill.

Defendant's Trade Dress

29. In its trade dress Defendant emphasizes the word "Naked," which is written in block letters similar to Plaintiff's Trade Dress, as shown below:



1 30. Defendant's Trade Dress features similar distinctive elements of
2 Plaintiff's Trade Dress, particularly the clear emphasis on "NAKED" in block letters.
3 The word "Intentionally" is a fraction of the size so as to confuse consumers who
4 may not even notice at first glance.

5 31. On information and belief, Defendant began using Defendant's Trade
6 Dress in commerce in connection with the sale of dietary and nutritional supplements
7 and in connection to provide information online relating to nutrition, diet, health and
8 wellness on or about April 6, 2018.

9 32. Defendant's Trade Dress is a deliberate copy of Plaintiff's Trade Dress
10 and constitutes a willful infringement. When coupled with Defendant's use of the
11 Naked Marks, the likelihood of confusion is exacerbated.

12
13 **V. CLAIMS FOR RELIEF**
14 **FIRST CLAIM FOR RELIEF**
15 **Trademark Infringement**
16 **(15 U.S.C. § 1114(a))**

17 33. Plaintiff realleges and incorporates by reference each and every
18 allegation set forth in paragraphs 1 through 32, inclusive.

19 34. Plaintiff has marketed and promoted its products under its Naked
20 Marks. Plaintiff's rights in its Naked Marks as used on its products are prior to any
21 rights Defendant could claim in the mark or any confusingly similar mark, and
22 Plaintiff's rights are superior to those of Defendant.

23 35. As a result of Plaintiff's marketing and promotion, Plaintiff's Naked
24 Marks, as used on its products, have come to signify products of a single source and
25 is the means by which those products and services are distinguished from the
26 products and services of others in the same and in related fields.

1 36. Defendant's continued use and claim of ownership of the domain name
2 www.intentionallynaked.com and its use of Intentionally Naked on products without
3 the authorization of Plaintiff infringes Plaintiff's exclusive rights in its trademarks for
4 the Naked Marks. Defendant's use and/or ownership of the domain name
5 www.intentionallynaked.com and use of Intentionally Naked, when used on
6 Defendant's product, are so similar to the established Naked Marks of Plaintiff as to
7 be likely to cause confusion, mistake, or deception as to the source of Defendant's
8 products or are likely to cause confusion as to the affiliation, connection or
9 association between Plaintiff's and Defendant's respective products.

10 37. Defendant has committed the acts alleged above with previous
11 knowledge of Plaintiff's prior use and superior rights to the Naked Marks, and with
12 previous knowledge of the reputation of Plaintiff's Naked Marks in interstate
13 commerce. Further, Defendant's actions were for the willful and calculated purpose
14 of trading upon Plaintiff's goodwill and for the willful and calculated purpose of
15 misleading and deceiving purchasers and the public.

16 38. Defendant's activities have caused and will cause irreparable harm to
17 Plaintiff for which Plaintiff has no adequate remedy at law in that: (i) if Defendant's
18 wrongful conduct continues, consumers are likely to become further confused as to
19 the source of Plaintiff's products; (ii) Plaintiff's Naked Marks are unique and
20 valuable property which has no readily determinable market value; (iii) the
21 infringement by Defendant constitutes an interference with Plaintiff's goodwill and
22 customer relationships; and (iv) Defendant's wrongful conduct, and the damages
23 resulting to Plaintiff, is continuing. Plaintiff has been damaged in an amount that will
24 be ascertained according to proof.

25 39. Plaintiff is informed and believes and thereon alleges that as a proximate
26 result of advantage accruing to Defendant's businesses from Plaintiff's nationwide
27 advertising, sales, and consumer recognition, and as a proximate result of confusion,
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1 deception, and/or mistake caused by Defendant's wrongful advertising and sale of its
2 products, as hereinabove alleged, bearing the name Naked, Defendants have made
3 substantial sales and/or profits.

4 40. Upon information and belief, Defendant's appropriation of Plaintiff's
5 marks was willful and knowing, making this an exceptional case within the meaning
6 of 15 U.S.C. §1117(a) and (b), entitling Plaintiff to, among other things, treble
7 damages and attorneys' fees.

8 41. At least since Defendant was put on notice of the potential for
9 infringement in November of 2017, yet Defendant continued its plans through April
10 when it willfully and knowingly launched an infringing product within the meaning
11 of 15 U.S.C. § 1117(a).

12 42. Plaintiff is entitled to injunctive relief, its attorneys' fees, and costs of
13 suit.

14 **SECOND CLAIM FOR RELIEF**

15 **Trademark Dilution**

16 **(15 U.S.C. § 1125(c))**

17 43. Plaintiff realleges and incorporates by reference each and every
18 allegation set forth in paragraphs 1 through 42, inclusive.

19 44. As a result of the duration and extent of use of the Naked Marks, the
20 duration and extent of the advertising and publicity of the Naked Marks, the
21 geographical extent of the distribution of the same, the superior quality of Plaintiff's
22 products and services, and the degree of recognition of the Naked Marks, Naked has
23 achieved an extensive degree of distinctiveness and is a famous trademark.

24 45. As a result of Defendant's use, Defendant is diluting the distinctive
25 quality of the Naked Marks.

26 46. Plaintiff will suffer irreparable harm should Defendant's unlawful acts
27 be allowed to continue to the great detriment of Plaintiff's reputation and goodwill.

1 47. Defendant's acts will continue unless enjoined.

2 **THIRD CLAIM FOR RELIEF**

3 **Trade Dress Infringement**

4 **(15 U.S.C. § 1125(a))**

5 48. Plaintiff realleges and incorporates by reference each and every
6 allegation set forth in paragraphs 1 through 47, inclusive.

7 49. Defendant has used in commerce trade dress which is confusingly
8 similar to Plaintiff's Trade Dress for dietary and nutritional supplements.
9 Defendant's use of trade dress that is confusingly similar to Plaintiff's Trade Dress is
10 likely to cause confusion, or to cause mistake, or to deceive as to the affiliation,
11 connection, or association of Defendant with Plaintiff, or as to the origin,
12 sponsorship, or approval of Defendant's goods by Plaintiff in violation of 15 U.S.C. §
13 1125(a).

14 50. Defendant's acts as alleged herein were and are committed with the
15 intent to confuse the public into thinking that there is an affiliation or association
16 with, or a sponsorship or approval of Defendant's products by Plaintiff. Plaintiff is
17 informed and believes that Defendant's acts of trade dress infringement have
18 deceived consumers and are likely to continue to deceive a substantial segment of the
19 consuming public, which is likely to influence purchasing decisions.

20 51. Defendant's Trade Dress, as alleged and shown herein, is confusingly
21 similar to Plaintiff's Trade Dress. Defendant's acts were done with knowledge and in
22 willful disregard of Plaintiff's exclusive rights in Plaintiff's Trade Dress.
23 Defendant's acts have injured and continue to injure Plaintiff in an amount of
24 damages to be proven at trial, consisting of, among other things, the diminution in
25 value and goodwill associated with its trade dress, lost sales, and Defendant's profits
26 attributable to the infringement, all in an amount to be proven at trial.

1 52. Plaintiff has been irreparably damaged and is continuing to be
2 irreparably damaged by Defendant's willful infringement of Plaintiff's Trade Dress
3 for which Plaintiff has no adequate remedy at law. Plaintiff is entitled under 15
4 U.S.C. § 1116 to a permanent injunction against Defendant's continuing
5 infringement.

6 53. Plaintiff is entitled to an award of Defendant's profits, damages caused
7 by Defendant's actions, and the costs of this action under 15 U.S.C. § 1117. Because
8 Defendant's wrongful acts alleged herein are willful, this is an extraordinary case
9 entitling Plaintiff to, among other things, treble damages and attorneys' fees under 15
10 U.S.C. § 1117 (a) and (b).

11 **FOURTH CLAIM FOR RELIEF**
12 **Trademark and Trade Dress Infringement**
13 **(Nevada Common Law)**

14 54. Plaintiff realleges and incorporates by reference each and every
15 allegation set forth in paragraphs 1 through 53, inclusive.

16 55. In addition to the federal registrations owned by Plaintiff as set forth
17 above, Plaintiff owns and uses the Naked Marks and enjoys common law rights in
18 Nevada and throughout the United States on the goods set forth above, and thus these
19 rights are senior and superior to any rights which Defendant may claim in its
20 infringing products.

21 56. Customers purchasing products will likely be confused by Defendant's
22 Intentionally Naked marked products and their association or affiliation with
23 Plaintiff's Marks. In addition to substantially similar marks on the same category of
24 goods, Plaintiff and Defendant sell in nearly identical good on identical market
25 channels. For example, Plaintiff's Naked branded products may be found on
26 Amazon.com and eBay.com. Plaintiff is informed and believes, and on that basis
27 alleges, that Defendant's Intentionally Naked marked products are offered for sale on
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1 these same channels of trade. Customers seeking Plaintiff's Naked marked products
2 are likely to be confused if and when they encounter Defendant's Intentionally Naked
3 marked products. Potential customers are also likely to perceive that Intentionally
4 Naked branded products are affiliated, sponsored, or in other ways connected with the
5 same source as Naked branded products.

6 57. Defendant's infringement will continue unless enjoined.

7 **FIFTH CLAIM FOR RELIEF**

8 **Injury to Business Reputation**

9 **(Nevada Common Law)**

10 58. Plaintiff realleges and incorporates by reference each and every
11 allegation set forth in paragraphs 1 through 57, inclusive.

12 59. As a result of the duration and extent of use of the Naked Marks, the
13 duration and extent of the advertising and publicity of the Naked Marks, the
14 geographical extent of the distribution of the same, the superior quality of Plaintiff's
15 products and services, and the degree of recognition of the Naked Marks, Naked has
16 achieved an extensive degree of distinctiveness.

17 60. Defendant's continued and intentional use of Naked, with full
18 knowledge of the damage said use has and will cause to Plaintiff, has damaged and
19 continues to injure Plaintiff's business reputation and goodwill, which it has
20 cultivated at great cost and expense, in contravention of Nevada common law.

21 61. Defendant's acts have injured Plaintiff in an amount to be proven at trial,
22 consisting of, among other harms, the diminution in value and goodwill associated
23 with its Naked Marks and trade dress, lost sales, and Defendant's profits attributable
24 to the infringement, all in an amount to be proven at trial.

25 62. Plaintiff will suffer irreparable harm should Defendant's unlawful acts
26 be allowed to continue to the great detriment of Plaintiff's reputation and goodwill.
27 Defendant's acts will continue unless enjoined.

SIXTH CLAIM FOR RELIEF

Unfair Competition

(Nevada Unfair Business Practices Act)

63. Plaintiff realleges and incorporates by reference each and every allegation set forth in paragraphs 1 through 62, inclusive.

64. The acts and conduct of Defendant as alleged above in this Complaint constitute unlawful, unfair, and/or fraudulent business acts or practices as defined by Nevada Revised Statute 598.0915, *et seq.*

65. Defendant's violation of federal law and common law, as alleged above in this Complaint, constitute unlawful and/or unfair business acts or practices. The Naked Marks are associated with Plaintiff due to Plaintiff's long-standing use, extensive sales, and marketing. Plaintiff has developed a valuable asset in the Naked Marks and its products sold thereunder. It is only fair and legitimate that Plaintiff be able to continue its business without unfair, improper, unauthorized interference by Defendant as alleged herein.

66. Defendant has attempted to encroach, and have encroached, upon the business of Plaintiff by use of a confusingly similar trademark and confusingly similar trade dress with the intention of misleading the public and benefiting from the goodwill established by Plaintiff over many years of commercial use of the Naked Marks and Plaintiff's Trade Dress.

67. Defendant's acts of unfair competition were intentional and knowing and done with a willful disregard for Plaintiff's longstanding rights to the use of its trademarks. Defendant's acts of unfair competition have proximately caused and will continue to cause Plaintiff to suffer injury in fact and loss of money and/or property in an amount to be proven at trial.

68. Defendant's acts of unfair competition also have caused and are causing irreparable injury to Plaintiff and to Plaintiff's Naked Marks and to the business and

1 goodwill represented thereby, and unless enjoined, will cause further irreparable
2 injury, whereby Plaintiff has no adequate remedy at law.

3 69. The aforesaid acts by Defendant were with knowledge and in willful
4 disregard of Plaintiff's prior rights in its Naked Marks and Plaintiff's Trade Dress.

5 70. Defendant's conduct as alleged above has damaged and will continue to
6 damage Plaintiff's goodwill and reputation and has resulted in a loss of revenue to
7 Plaintiff in an amount that is unknown at the present time but will be ascertained in
8 this action.

9 71. Plaintiff is entitled under Nevada Revised Statute 598.0915, *et seq.* to
10 restitution by Defendant of anything taken from Plaintiff by way of Defendant's
11 unfair business practices.

12 72. Defendant's acts complained of herein constitute malice, oppression
13 and/or fraud thus entitling Plaintiff to recover punitive damages.

14 **SEVENTH CLAIM FOR RELIEF**

15 **Anti-Cybersquatting Consumer Protection Act**

16 **(15 U.S.C. § 1125(d))**

17 73. Plaintiff realleges and incorporates by reference each and every
18 allegation set forth in paragraphs 1 through 72, inclusive.

19 74. Plaintiff is informed and believes, and on that basis alleges, that
20 Defendant has a bad faith intent to profit from the registration and use of the domain
21 name www.intentionallynaked.com.

22 75. The domain name www.intentionallynaked.com is confusingly similar to
23 Plaintiff's Naked Marks. Consumers attempting to reach Plaintiff's website are likely
24 to be confused by Defendant's domain name as to the source, sponsorship, affiliation,
25 or endorsement of the site.

26 76. Defendant's registration and use of the domain name is causing
27 irreparable and incalculable injury to Plaintiff and to Plaintiff's Naked Marks and
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1 Naked tradename and the business and goodwill represented thereby, and unless
2 Defendant's registration of the domain names is cancelled, will cause further
3 irreparable and incalculable injury, whereby Plaintiff has no adequate remedy at law.

4 **PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiff respectfully requests judgment as follows:

- 6 1. An order permanently enjoining Defendant, its officers, agents,
7 employees, attorneys, and all persons in concert or participating with any of them
8 from:
- 9 a. Committing any further acts of trademark and trade dress
10 infringement;
 - 11 b. Using any term that is likely to be confused with the Naked Marks
12 or Naked tradename asserted herein;
 - 13 c. Representing directly or indirectly in any form of manner
14 whatsoever that any product is associated with or approved by Plaintiff when,
15 in fact, it is not;
 - 16 d. Passing off or inducing or enabling others to sell or pass off any
17 product as one of Plaintiff's products or as a product endorsed or approve by
18 Plaintiff; and
 - 19 e. Committing any other act calculated to compete unfairly in any
20 manner.
- 21 2. An order seizing and impounding all infringing products and all
22 manufacturing supplies in Defendant's possession or control.
- 23 3. An order requiring Defendant to expressly abandon U.S. Trademark
24 Application Serial No. 87/615,283 for the mark Intentionally Naked from the United
25 States Patent and Trademark Office, and to refrain from seeking any other trademark
26 registration inconsistent with the foregoing injunctive relief;
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4. An order awarding to Plaintiff damages in the amount that Plaintiff has been harmed by Defendant's infringements and unfair business practices, in and amount to be proven at trial;

5. An order requiring Defendant to discontinue use of the domain name www.intentionallynaked.com and an order requiring Defendant to transfer ownership of the domain to Plaintiff;

6. An order for an accounting and disgorgement of Defendant's profits from its infringing and unfair business activity;

7. A finding that Defendant has willfully and deliberately committed acts of trademark infringement against Plaintiff;

8. An order trebling such damages against Defendant;

9. An order for attorneys' fees and costs that Plaintiff incurred in having to bring and sustain this action for the legal enforcement of its trademark and business rights against Defendant;

10. Such further equitable and legal relief as the Court may deem appropriate.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands and jury trial on their claims on all issues triable by a jury.

DATED: August 27, 2018

KAEDIAN, LLP

/s/ Nannina Angioni
Nannina Angioni
Attorney for Plaintiff,
NAKED WHEY, INC.

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EXHIBIT A

United States of America

United States Patent and Trademark Office

NAKED PEA

Reg. No. 5,020,266

Registered Aug. 16, 2016

Int. Cl.: 5

Trademark

Principal Register

Naked Whey Inc. (FLORIDA CORPORATION), DBA Naked Nutrition ,
PO Box 348634
Coral Gables, FL 33234

CLASS 5: Dietary and nutritional supplements containing pea; Protein dietary supplements containing pea; Protein supplements containing pea

FIRST USE 9-29-2014; IN COMMERCE 9-29-2014

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

No claim is made to the exclusive right to use the following apart from the mark as shown:
"PEA"

SER. NO. 86-661,904, FILED 06-14-2015

JOHN S YARD, EXAMINING ATTORNEY



Michelle K. Lee

Director of the United States
Patent and Trademark Office

United States of America

United States Patent and Trademark Office

Naked Whey

Reg. No. 5,304,094

Registered Oct. 10, 2017

Int. Cl.: 5

Trademark

Principal Register

Naked Whey Inc (FLORIDA CORPORATION), DBA Naked Nutrition
Po Box 348634
Coral Gables, FLORIDA 33234

CLASS 5: Protein dietary supplements containing whey; Protein supplements containing whey; Whey protein supplements

FIRST USE 9-29-2014; IN COMMERCE 9-29-2014

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

No claim is made to the exclusive right to use the following apart from the mark as shown:
"WHEY"

SER. NO. 86-410,554, FILED 09-30-2014



Joseph Matol

Performing the Functions and Duties of the
Under Secretary of Commerce for
Intellectual Property and Director of the
United States Patent and Trademark Office

United States of America

United States Patent and Trademark Office

Naked Nutrition

Reg. No. 5,304,095

Registered Oct. 10, 2017

Int. Cl.: 5

Trademark

Principal Register

Naked Whey Inc (FLORIDA CORPORATION), DBA Naked Nutrition
Po Box 348634
Coral Gables, FLORIDA 33234

CLASS 5: Dietary and nutritional supplements

FIRST USE 9-30-2014; IN COMMERCE 9-30-2014

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

No claim is made to the exclusive right to use the following apart from the mark as shown:
"NUTRITION"

SER. NO. 86-410,588, FILED 09-30-2014



Joseph Matol

Performing the Functions and Duties of the
Under Secretary of Commerce for
Intellectual Property and Director of the
United States Patent and Trademark Office

United States of America

United States Patent and Trademark Office

Naked Casein

Reg. No. 5,304,096

Registered Oct. 10, 2017

Int. Cl.: 5

Trademark

Principal Register

Naked Whey Inc (FLORIDA CORPORATION), DBA Naked Nutrition
Po Box 348634
Coral Gables, FLORIDA 33234

CLASS 5: Casein dietary supplements; Protein dietary supplements containing casein;
Protein supplements containing casein

FIRST USE 9-30-2014; IN COMMERCE 9-30-2014

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY
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No claim is made to the exclusive right to use the following apart from the mark as shown:
"CASEIN"

SER. NO. 86-410,673, FILED 09-30-2014



Joseph Matol

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United States of America

United States Patent and Trademark Office

NAKED EGG

Reg. No. 5,204,303

Registered May 16, 2017

Int. Cl.: 5

Trademark

Principal Register

Naked Whey Inc. (FLORIDA CORPORATION), DBA Naked Nutrition ,
PO Box 348634
Coral Gables, FL 33234

CLASS 5: Dietary and nutritional supplements containing egg; Protein dietary supplements containing egg; Protein supplements containing egg

FIRST USE 4-29-2016; IN COMMERCE 4-29-2016

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

No claim is made to the exclusive right to use the following apart from the mark as shown: "EGG"

SER. NO. 87-190,238, FILED 09-30-2016
LOURDES AYALA, EXAMINING ATTORNEY



Michelle K. Lee

Director of the United States
Patent and Trademark Office

United States of America

United States Patent and Trademark Office

NAKED GOAT

Reg. No. 5,204,308

Registered May 16, 2017

Int. Cl.: 5

Trademark

Principal Register

Naked Whey Inc. (FLORIDA CORPORATION), DBA Naked Nutrition ,
PO Box 348634
Coral Gables, FL 33234

CLASS 5: Dietary and nutritional supplements containing goat's milk; Protein dietary supplements containing goat's milk; Protein supplements containing goat's milk

FIRST USE 9-29-2014; IN COMMERCE 9-29-2014

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

SER. NO. 87-190,331, FILED 09-30-2016
LOURDES AYALA, EXAMINING ATTORNEY



Michelle K. Lee

Director of the United States
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United States of America

United States Patent and Trademark Office

NAKED RICE

Reg. No. 5,204,309

Registered May 16, 2017

Int. Cl.: 5

Trademark

Principal Register

Naked Whey Inc. (FLORIDA CORPORATION), DBA Naked Nutrition ,
PO Box 348634
Coral Gables, FL 33234

CLASS 5: Dietary and nutritional supplements containing rice; Protein dietary supplements containing rice; Protein supplements containing rice

FIRST USE 9-29-2014; IN COMMERCE 9-29-2014

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

No claim is made to the exclusive right to use the following apart from the mark as shown:
"RICE"

SER. NO. 87-190,337, FILED 09-30-2016
LOURDES AYALA, EXAMINING ATTORNEY



Michelle K. Lee

Director of the United States
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United States of America

United States Patent and Trademark Office

NAKED PB

Reg. No. 5,369,917

Registered Jan. 02, 2018

Int. Cl.: 5

Trademark

Principal Register

Naked Whey Inc. (FLORIDA CORPORATION)
Po Box 348634
Coral Gables, FLORIDA 33234

CLASS 5: Powdered nutritional supplement drink mix containing namely, plant-based protein powder; nutritional supplements, namely, high protein powder formulas to be mixed with water; dietary and nutritional supplements, namely, peanut butter powder

FIRST USE 9-20-2014; IN COMMERCE 9-20-2014

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

SER. NO. 87-479,694, FILED 06-07-2017



Joseph Matal

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United States of America

United States Patent and Trademark Office

LESS NAKED

Reg. No. 5,370,138

Registered Jan. 02, 2018

Int. Cl.: 5

Trademark

Principal Register

Naked Whey Inc. (FLORIDA CORPORATION), DBA Naked Nutrition
P.o. Box 348634
Coral Gables, FLORIDA 33234

CLASS 5: Dietary and nutritional supplements

FIRST USE 4-21-2016; IN COMMERCE 4-21-2016

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY
PARTICULAR FONT STYLE, SIZE OR COLOR

SER. NO. 87-512,934, FILED 06-30-2017



Joseph Matol

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United States of America

United States Patent and Trademark Office

Naked Glutamine

Reg. No. 5,378,686

Registered Jan. 16, 2018

Int. Cl.: 5

Trademark

Principal Register

Naked Whey Inc. (FLORIDA CORPORATION)
Po Box 348634
Coral Gables, FLORIDA 33234

CLASS 5: Nutritional supplements consisting primarily of glutamine

FIRST USE 1-15-2017; IN COMMERCE 1-15-2017

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

No claim is made to the exclusive right to use the following apart from the mark as shown:
"GLUTAMINE"

SER. NO. 87-479,701, FILED 06-07-2017



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United States Patent and Trademark Office

Naked Creatine

Reg. No. 5,384,586

Registered Jan. 23, 2018

Int. Cl.: 5

Trademark

Principal Register

Naked Whey Inc. (FLORIDA CORPORATION)
Po Box 348634
Coral Gables, FLORIDA 33234

CLASS 5: Dietary and nutritional supplements containing creatine; Dietary supplements containing creatine; Nutritional supplements containing creatine; Nutritional drinks containing creatine

FIRST USE 6-15-2015; IN COMMERCE 6-15-2015

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

No claim is made to the exclusive right to use the following apart from the mark as shown: "CREATINE"

SER. NO. 87-479,705, FILED 06-07-2017



Joseph Matal

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United States Patent and Trademark Office

United States of America

United States Patent and Trademark Office

NAKED MASS

Reg. No. 5,500,843

Registered Jun. 26, 2018

Int. Cl.: 5

Trademark

Principal Register

Naked Whey Inc. (FLORIDA CORPORATION), DBA Naked Nutrition
P.o. Box 348634
Coral Gables, FLORIDA 33234

CLASS 5: Dietary and nutritional supplements

FIRST USE 4-8-2015; IN COMMERCE 4-8-2015

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

No claim is made to the exclusive right to use the following apart from the mark as shown:
"MASS"

SER. NO. 87-512,911, FILED 06-30-2017



Andrei Iancu

Director of the United States
Patent and Trademark Office

United States of America

United States Patent and Trademark Office

NAKED ENERGY

Reg. No. 5,533,423

Registered Aug. 07, 2018

Int. Cl.: 5

Trademark

Principal Register

Naked Whey Inc. (FLORIDA CORPORATION)

9 Island Ave, Apt 2102

Miami Beach, FLORIDA 33139

CLASS 5: Dietary and nutritional supplements

FIRST USE 7-20-2017; IN COMMERCE 7-20-2017

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

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"ENERGY"

SER. NO. 87-603,015, FILED 09-11-2017



Andrew L. Kanner

Director of the United States
Patent and Trademark Office

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EXHIBIT B


Whey Protein Powder Reviews

Secure <https://nkdnutrition.com/pages/whey-protein-reviews>

FREE SHIPPING ON ALL ORDERS

NAKED NUTRITION HOME PROTEIN SUPPLEMENTS RECIPES & INFO ABOUT

WHEY PROTEIN REVIEWS



CUSTOMER REVIEWS
★★★★★ Based on 691 reviews [Write a review](#)

★★★★★
Excellent Grass Fed Whey
Garry on May 30, 2017
The cleanest Grass Fed Whey Protein Powder that I have found. I mix 30 grams Naked Whey, 2 grams Naked Creatine with 8 oz. distilled water 2 times daily, 6 days a week. I like the 5-lb size and containers with scoop. Great Product.
[Report as inappropriate](#)

★★★★★
Five Stars
Alex on Feb 09, 2017
Best protein product around. Tastes good and feels good.
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★★★★★
Five Stars
Alex on Feb 04, 2017
Best protein product around. Tastes good and feels good.
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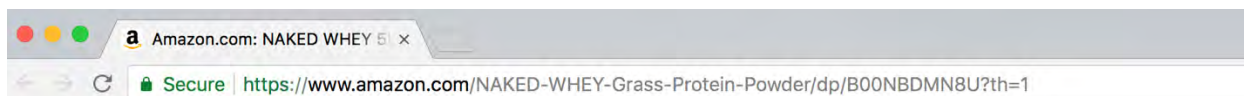
★★★★★
Five Stars
Ben on Feb 04, 2017
Good stuff.
[Report as inappropriate](#)

★★★★★
Best Unflavored Clean Whey
R. Ramon on Feb 04, 2017
I've gone through two containers and if you're looking for clean unflavored whey, then look no further. Naked Whey is as good as it gets and Amazon has the best price.
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NAKED WHEY 5LB 100% Grass Fed Whey Protein Powder - US Farms, #1 Undenatured, Bulk, Unflavored - GMO, Soy, and Gluten Free - No Preservatives -...

NAKED nutrition

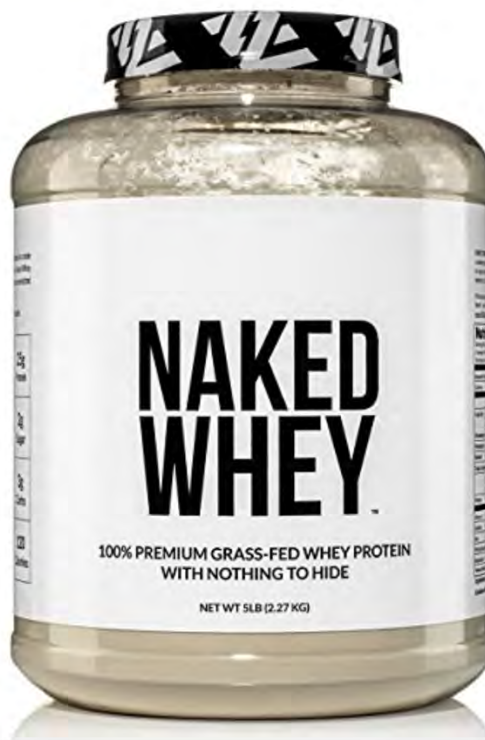


1,388 customer reviews

| 238 answered questions

Amazon's Choice

for "naked whey"



About the product

- **ONLY ONE INGREDIENT:** 100% Grass-Fed Pure Whey Protein with zero additives. Naked Whey has no artificial sweeteners, flavors, or colors and is GMO-Free, Growth Hormone Free, Soy Free and Gluten-Free.
- **ALL NATURAL WHEY PROTEIN:** Our Grass Fed Whey is sourced from small dairy farms in California to bring you a non-denatured whey packed full of essential amino acids, clean protein and glutathione.
- **"MAXIMUM NUTRITION:** 25g of Protein, 2g of Sugar, 3g of Carbs, 120 Calories, and 5.9g of BCAAs (branched-chain amino acids) per serving. "
- **COLD PROCESSED:** Unlike most whey protein powders, Naked Whey is cold processed to ensure zero contamination from chemical detergents (no acid or bleach), synthetic additives, or heavy metals, and this maintains important naturally occurring growth factors.
- **THE PERFECT WORKOUT PARTNER:** Add a banana, blueberries and more to create your best pre and post workout whey shakes, smoothies and recipes to take your muscle gains and recovery to new heights.

[Product information](#)

By Alexa Erickson
Updated August 20, 2018

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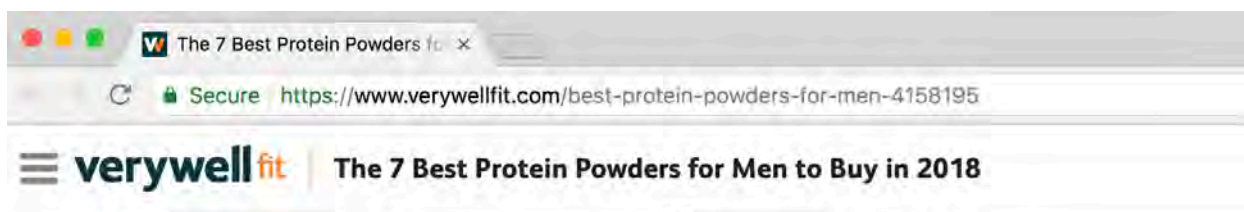


Reducing Body Fat

Whether you're trying to reach a new personal record in your workout, looking to gain muscle, or wanting to drop a few pounds, protein powder can help you reach your fitness and wellness goals. The [benefits of protein](#) include aiding in muscle recovery and also keeping you full post-workout. There are an endless array of protein powders on the market, but when choosing your ideal blend, it is best to keep budget, dietary restrictions, and your goals in mind.

If you want something affordable, whey protein is the most popular option and it comes in a ton of different flavors like chocolate, vanilla, strawberry, and even birthday cake. Looking for a vegan option? You can try a concoction that gets its protein from vegetables, nuts, or legumes and therefore has zero dairy content. And if weight loss is your main objective, try a powder with casein—a type of protein that comes mainly from cow's milk—to keep you satisfied until your next meal and prevent you from snacking. Whey is also a great ingredient for weight loss because it can boost your metabolism and burn more calories in the long term.

Here, we've rounded up the best protein powders for men so you can find the perfect one for your specific goals.



Best Vegan: Naked Nutrition Pea Protein Isolate



Buy on Amazon

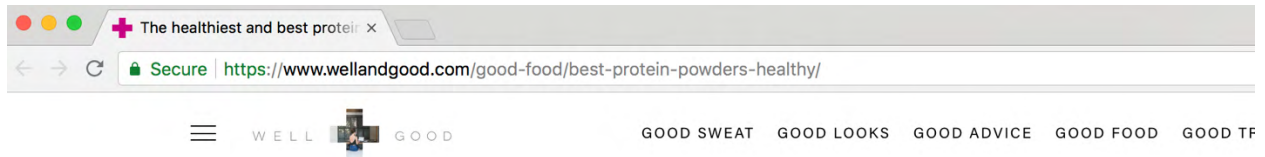
\$55

prime

For vegans and anyone who prefers a minimalist approach to ingredients, Naked Nutrition is for you. The brand's pea protein isolate features just one ingredient: 100% yellow-pea protein. There are zero additives, so you won't have to worry about sneaky artificial sweeteners, flavors, or colors. It's also GMO-free, soy-free, and gluten-free.

The dairy-free protein powder is made from raw yellow peas that are grown on farms based in the United States and Canada. Per serving, you'll get 27 grams of protein and 5.7 grams of branched-chain amino acids (BCAAs) for muscle growth. At the same time, this vegan protein powder contains only 120 calories, 2 grams of carbs and 2 grams of sugar per serving.

Need some more help finding what you're looking for? Read through our [best vegan protein powders](#) article.



THE 5 HEALTHIEST PROTEIN POWDERS



GOOD FOOD
by LISA ELAINE HELD, JULY 6, 2018



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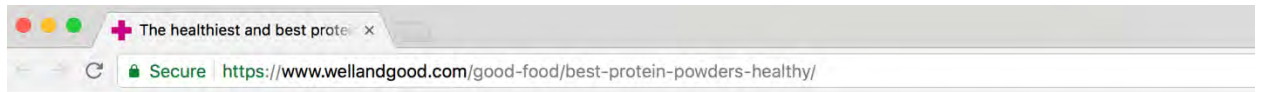
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Photo: Pixabay/Milivantly



up. Here they are, listed in no particular order (with handy per-ounce price comparisons so your wallet retains muscle, too).

Keep reading to find out which five protein powders are the very best.

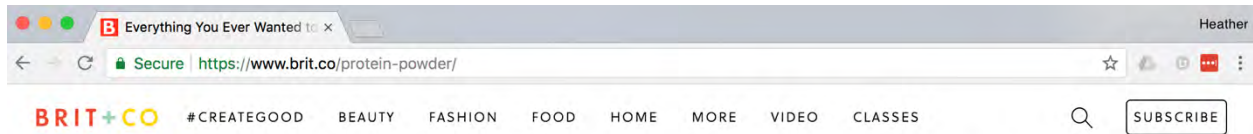


Photo: Naked Whey

Naked Protein

It really doesn't get any simpler than Naked's line of one-ingredient powders from a variety of sources. Naked Whey is just whey protein concentrate; Naked Goat is *goat* whey protein concentrate; Naked Pea is yellow pea protein. And the company's ingredient sourcing is top-notch—as in the whey comes from grass-fed cows' milk, the peas are non-GMO, and everything is processed in the cleanest way possible. "Any are fine—pick one based on allergies or preference," Richter says. You'll notice the difference in terms of taste, too. No weird sweetness or cardboard-reminiscent aftertaste, here.

Price Check: \$1.12 per ounce



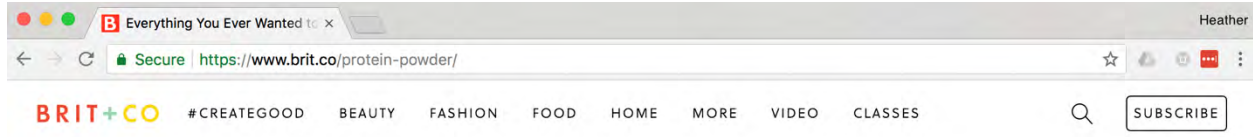
Everything You Ever Wanted to Know About Protein Powder

Michelle Swift · Mar 16, 2015

New to the protein powder game? We get you — standing in the nutrition aisle at your local health food store, Googling “which protein powder is the best?” can be a bit daunting. That’s why we’re going to make choosing your perfect protein powder a whole lot easier. We’re sharing everything you need to know for selecting the right protein for your body. With this guide in hand, you’ll be finding excuses to slip the stuff in all of your recipes.

Whey Protein





Casein Powder



Buy This: Casein Protein (\$95) is the main protein in milk and is absorbed more slowly than whey. It's not a powerhouse muscle builder, but what it does have going for it is the fact that it leaves you feeling fuller longer. Naked Casein comes from US farms and is as natural — no additives or artificial flavors.

The Best Protein Powders For Your Smoothie

Whether you're looking for whey, casein, egg white protein, soy protein, pea protein or something else, these are the best options.



By Stephanie Eckelkamp Jun 27, 2018



GETTY IMAGES

Your [smoothie recipe](#) calls for a scoop of protein powder. So you go to the store only to discover dozens of different varieties: whey, soy, casein, pea, rice, hemp...the list goes on and on. Complicating matters, there are two-powder blends, those made with sugar and without, ones sourced from grass-fed dairy or non-GMO soy. Ugh! It can feel like a near-impossible feat just to choose one that makes sense for you.

RELATED STORIES



Protein Ball Recipes That Will Wow Your Taste Buds



8 Creative Ways To Use Protein Powder

But choosing a protein powder doesn't have to be akin to buying a new car. We're here to tell you that while all powders claim to be awesome, they're not all equal. Finding the right one for you depends on your health goals and dietary restrictions, and should also be

based on a protein's bioavailability, or how easily your body absorbs it. "One of the more recent, accepted ways to assess the protein quality and bioavailability is the

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18 Best Protein Powders For Smoothies

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Prevention HEALTH BEAUTY WEIGHT LOSS HEALTH CONDITIONS SUBSCRIBE FOLLOW Q

by both quality and bioavailability, as well as their other perks (and pitfalls), so you can pick one that fits your needs.

1. Whey protein





Whey, derived from cow's milk, leads the herd as the best protein source. It's called a "complete" protein, meaning it contains all nine essential amino acids—the ones your body can't make on its own. Whey enters your bloodstream faster than any other protein and boasts the highest level of the amino acid leucine, which provides muscles with the necessary fuel to power through a workout and build muscle. In fact, whey is the most effective powder at building muscle; so if that's a goal, aim to consume it within an hour after exercise.

PDCAA Score: 1.0

Choose this if: You simply want the best powder to increase your protein intake or are looking to build or maintain muscle.

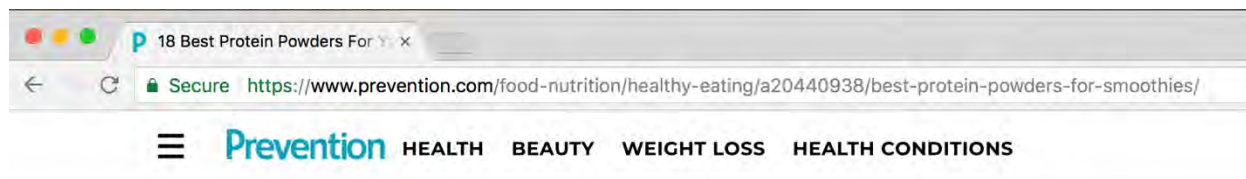
What to look for: You have a couple of choices: If maximum protein is what you're after, choose a whey protein isolate or whey hydrolysate—these are higher protein (90 percent) and contain a bit less fat, carbs, and lactose. If a super clean product with slightly less protein is more your taste, opt for a concentrate (80 percent)—these are readily available in organic, grass-fed varieties which contain no trace hormones, pesticides, or grain feed byproducts.

Prevention Picks: Best Whey Protein Powders

 <p>Grass-fed Organic Whey Protein, Unflavored, 2 lbs Source Organic amazon.com \$64.99</p> <p>BUY NOW</p>	 <p>Grass Fed New Zealand Whey Protein Isolate, Unflavored, 2 lbs Antler Farms amazon.com \$54.99</p> <p>BUY NOW</p>	 <p>Grass Fed Whey Protein Powder, Unflavored, 5 lbs Naked Nutrition amazon.com \$89.99</p> <p>BUY NOW</p>	 <p>Grass Fed Whey Protein, Unflavored, 5 lbs Levels Nutrition amazon.com \$59.95</p> <p>BUY NOW</p>
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20 Ways To Slim Down Your Sandwich

f



2. Casein protein

Casein, the main protein in milk, is absorbed more slowly than whey, so it's not quite as efficient at building muscle. But it can leave you feeling fuller longer, which makes it a great addition to meal-replacement smoothies or your morning oatmeal. Casein has also been found to enhance muscle building when blended with whey in a post-workout shake, such as these 10 delicious [smoothie recipes](#).

PDCAA Score: 1.0

Choose this if: You generally use protein powder as a meal replacement or before bed, or if you want to combine it with whey for optimal muscle-building effects.

What to look for: Opt for micellar casein, the slowest-digesting casein. Like with whey, choose casein made with organic, grass-fed dairy if possible; or free of growth hormones.

Prevention Picks: Best Casein Protein Powders



Micellar Casein Protein, Unflavored, 5 lbs

Naked nutrition
amazon.com
\$94.99

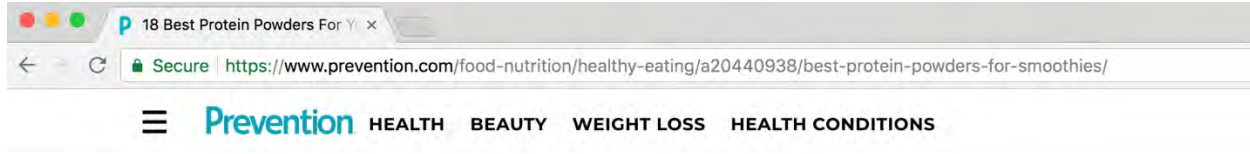
[BUY NOW](#)



Micellar Casein Protein Powder, Unflavored, 5 lbs

ProMix Nutrition
amazon.com
\$89.99

[BUY NOW](#)



3. Egg white protein

Egg white protein is just what it sounds like: Dried whites that have been turned into a powder. This protein digests slower than whey but faster than casein. Although not quite as good as whey or casein in terms of muscle protein synthesis, it's still a good option in a post-workout or meal-replacement smoothie.

PDCAA Score: 1.0

Choose this if: You're allergic to or don't eat dairy (e.g., [Paleo dieters](#)), but still want a high-quality complete protein.

What type: Your only option is "egg white powder," sometimes called "egg white albumen."

Prevention Picks: Best Egg White Protein Powders



Egg White Powder, Unflavored, 1.2 lb

Now Foods
iherb.com
\$21.67

[BUY NOW](#)



Egg White Protein Powder, Unflavored, 3 lbs

Naked Nutrition
amazon.com
\$59.99

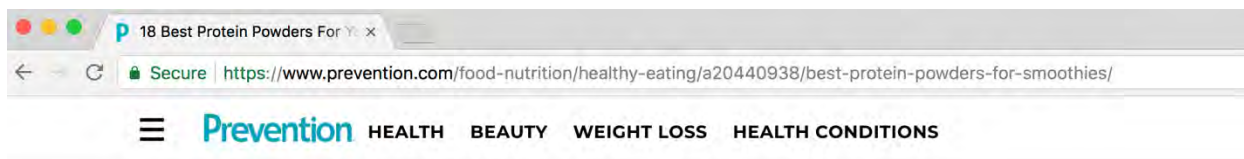
[BUY NOW](#)



Paleo Thin Protein Powder, Unflavored, 2 lbs

Julian Bakery
amazon.com
\$29.99

[BUY NOW](#)



5. Pea protein

Pea protein, derived from the yellow pea, is the most highly digestible of the plant proteins, making it a good alternative for anyone with a sensitive stomach who doesn't want to do dairy or soy. But it's not a complete protein—it's low in two amino acids—so pair it with another plant-based protein such as hemp or [rice protein](#) to round out its amino acid profile and make it "complete."

PDCAAS: 0.69

Choose this if: You avoid animal-derived products, but don't want to eat soy, or if you have digestive issues.

What type: If you want higher protein content, choose a "pea protein isolate." The slightly lower-protein "pea protein powder" is also a good choice, and readily available in organic varieties.

Prevention Picks: Best Pea Protein Powders



Vegan Pea Protein Isolate, Unflavored, 5 lbs

Naked Nutrition
amazon.com
\$54.99

BUY NOW



Pea Protein Powder, Unflavored, 16 oz

Bob's Red Mill
amazon.com
\$17.83

BUY NOW



Sports Organic Pea Protein, Unflavored, 1.5 lbs

Now Sports
amazon.com
\$20.79

BUY NOW



Pea Protein, Vanilla, 5 lb

Naked Nutrition
amazon.com
\$54.99

BUY NOW

The Best Protein Powder for Women After a Workout

Your muscles need a jolt of recovery juice.



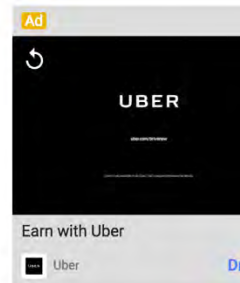
BY AMY CAPETTA Aug 10, 2016



When it comes to choosing a protein powder, the options seem endless: According to data from [Statista](#), the U.S. market for sports protein powder totaled \$4.7 billion in 2015, with an expectation to hit \$7.5 billion by the year 2020. That means there are a lot of different protein powders on store shelves, making it all the more difficult to know what's best for women.

The massive growth in this product category makes sense though: Not only is it a convenient source of protein when you're on the go, but there are solid health benefits you can gain from downing a shake. "It helps the body build and repair tissue and cells, including muscle cells," says [Erin Palinski-Wade, R.D.](#), author of *Belly Fat Diet For Dummies*. "When [it's] consumed directly after [working out](#), it can also enhance muscle gains in strength and endurance."

Plus, protein powder — which is derived from a high-protein source like the whey in milk or the protein in peas — could help with [weight loss](#) and maintenance, says [Amy Gorin, M.S.](#), a registered dietitian in New York City. The supplement helps keep you full longer, and it's



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10 Natural Ways to Lower Yo Pressure

Presented by CocoaVia



The Best Probiotic Foods Fo Gut



WD 6 Best Protein Powders for Women
Secure https://www.womansday.com/health-fitness/g22640015/best-protein-powders-women/


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the protein in peas — could help with [weight loss](#) and maintenance, says [Amy Gorin, M.S.](#), a registered dietitian in New York City. The supplement helps keep you full longer, and it's super versatile — many toss it into [smoothies](#), oatmeal, iced coffee, and [baked goods](#) to give their meals a boost.

But you don't want to go overboard on the amount of [protein you take in](#). "For the most part, the body will optimally process up to about 30 grams of protein every few hours," Gorin says. Nothing drastic happens if you go over that, but it won't be processed efficiently, which could [slow your digestive system](#).

Still not sure which protein powder is the best choice? Six nutritionists share which ones they have stocked in their pantry.



What Every Woman Needs to Know About Her Thyroid





NAKED NUTRITION GRASS-FED WHEY PROTEIN POWDER

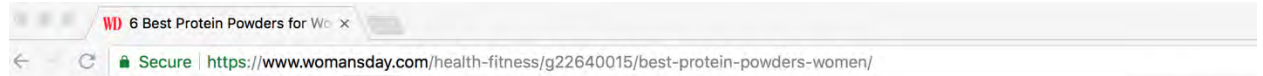
\$85

[SHOP NOW](#)

Some companies tout their protein powder as healthy, but when you look at the ingredient list, you see additives and artificial flavorings. That's not the case here, which is why Pallinski-Wade is a fan. "It contains just one ingredient — whey protein," she says. The fact that it's grass-fed is another positive. Many nutritionists recommend foods from [grass-fed animals](#) since these options contain more of the essential nutrients our bodies need. In the case of whey, the protein powder will have more [heart-healthy omega-3 fatty acids](#).

Protein per serving: 25g



WD **Woman'sDay** Food Health Home Relationships Travel

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protein powder will have more heart-healthy omega-3 fatty acids.

Protein per serving: 25g



AMAZON PRIME



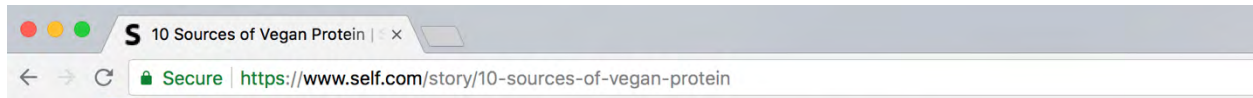
NAKED EGG WHITE PROTEIN POWDER

\$57

SHOP NOW

Gorin opts for egg white powder over other varieties because she says it's the next best thing to getting your protein from [whole foods](#) (something she recommends doing as much as possible). Plus, this version only has two ingredients — pure dried egg whites and sunflower lecithin — and there are no sugar alcohols or substitutes, which she says makes the powder very close to its natural form. And for those who want to add their protein powder to meals, this one's neutral taste won't alter any flavors.

Protein per serving: 25g



SELF

Food | July 24, 2016 | By Jeannine Morris

10 Amazing Sources of Vegan Protein

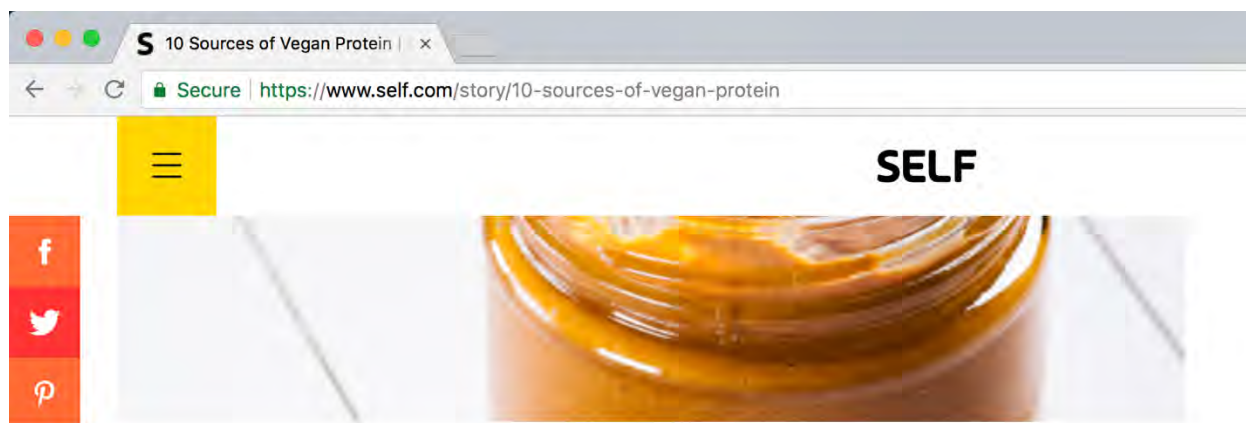
Tofu isn't the only answer.



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8. Almond butter

7 grams of protein per 2-Tablespoon serving

This paste made from almonds is much grittier than peanut butter and contains more fiber, calcium, potassium, and iron, and *less* saturated fat. Try adding a scoop of **almond butter** on top of your oatmeal, in a smoothie, or slathering it on top of a banana or **piece of toast**.

9. Pea protein

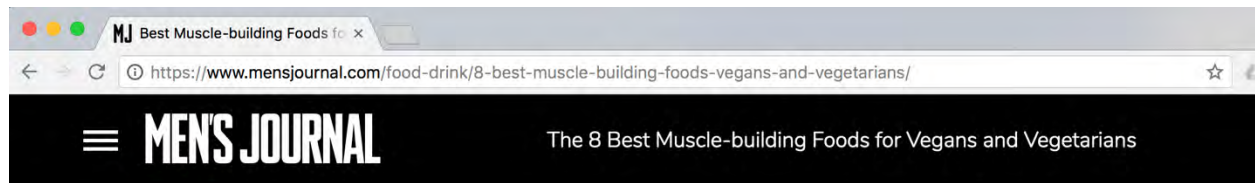
14 grams of protein per 2-Tablespoon serving

Pea protein is a newly popular protein option derived from yellow peas. It's easy to digest, and a good source of arginine (an amino acid your body needs to build muscle), and branch chain amino acids (protein compounds that can delay fatigue during exercise). Add some in powder form to your **post-workout smoothie**. You can also add it to gluten-free baked goods to improve the texture while getting a nice protein kick. Godfrey recommends **Naked Nutrition Pea Protein Powder**.

10. Hemp seeds

5 grams of protein for a 2-Tablespoon serving

Technically a nut, **hemp seeds** (often called hemp hearts) are something of a hybrid between a sunflower seed and pine nut. They're also rich in fiber, omega-3 fatty acids, and magnesium. Since they're versatile, they can be used in both savory and sweet dishes.



FOOD & DRINK

The 8 Best Muscle-building Foods for Vegans and Vegetarians



8

by Julie D. Andrews and Men's Fitness Editors



You can still maintain strong bones as a **vegan or vegetarian** and **gain muscle**. What's key, says Leslie Bonci, R.D., L.D.N., director of sports nutrition at the University of Pittsburgh Medical Center, is packing in calcium-rich dairy subs while following this simple formula for successful muscle protein synthesis: Weight training plus **adequate protein**—that is, getting enough protein and spreading intake throughout the day.

Then, aim to get .5-.7g of protein per pound of bodyweight daily, suggests Bonci, divided evenly among meals. For a 150-lb man, that's 75-105g daily. Ideally, slip 25-35g of protein and at least 2g of leucine (an essential amino acid and **protein**

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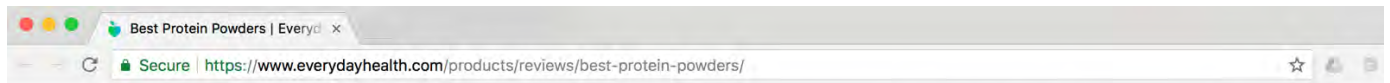
The 8 Best Muscle-building Foods for Vegans and Vegetarians



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7. Pea and Hemp Protein Powder

"We're seeing a lot more of these proteins popping up in protein powders," Brown says. "Pea protein is one of the best protein sources out there, nutritionally- and amino acid-wise, because its similar to animal protein." Looking for pea protein, try **Naked Pea** and **Nutiva Hemp Protein**.



EVERYDAY HEALTH

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6 Best Protein Powders to Boost Your Post-Workout Shakes

From whey protein powder to a 100 percent organic plant-based option — these are our top picks for the best protein powders to boost your morning.

By [Katherine Louie](#)

Medically Reviewed by [Kelly Kennedy, RD](#)



While most American adults with well-balanced diets consume a sufficient amount of protein, those who are looking to increase their muscle mass and strength may need protein supplements. Christopher Stokey/Thinkstock

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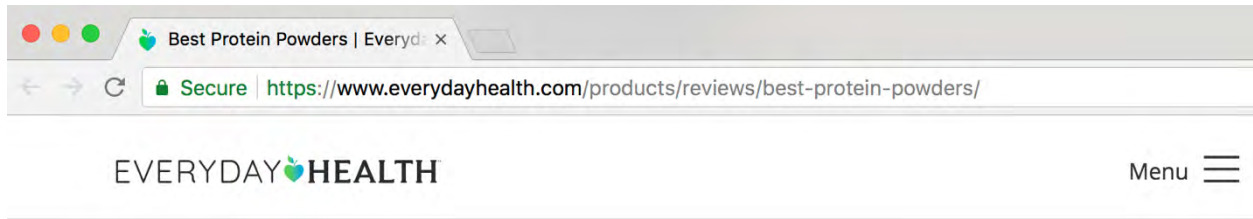


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Naked Pea



If you're looking to avoid animal-based proteins and you don't like the taste of soy, pea protein might be the best option for you. [Naked Pea](#) has only one ingredient, 100 percent yellow pea protein, so you won't have to worry about artificial sweeteners, flavors, or other ingredients that you can't pronounce. The one drawback? It's not a complete protein, so you might want to supplement this with another plant-based protein, such as rice or hemp.

[Available from Amazon starting at \\$53 \(5 pounds\)](#)